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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

**CLINT MILLIEN and FELIPE KELLY,
individually and on behalf of all others similarly
situated,**

Plaintiffs,

v.

**THE MADISON SQUARE GARDEN
COMPANY and MSGN HOLDINGS, L.P.,**

Defendants.

Case No. 17 Civ. 4000 (AJN)(HBP)

**NOTICE OF PLAINTIFFS' UNOPPOSED MOTION FOR PRELIMINARY APPROVAL
OF CLASS ACTION SETTLEMENT, CONDITIONAL CERTIFICATION OF
SETTLEMENT CLASSES, APPOINTMENT OF CLASS COUNSEL, AND
APPROVAL OF PLAINTIFFS' PROPOSED NOTICE OF SETTLEMENT**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Class Action Settlement, Conditional Certification of Settlement Classes, Appointment of Class Counsel, and Approval of Plaintiffs' Proposed Notice of Settlement ("Motion for Preliminary Approval of Settlement") and in the Declaration of Ossai Miazad in Support of Plaintiffs' Motion for Preliminary Approval of Settlement ("Miazad Decl."), and the supporting exhibits thereto, Plaintiffs respectfully request that the Court enter an Order:

- (1) granting preliminary approval of the Settlement Agreement, attached as **Exhibit A** to the Miazad Decl.;
- (2) conditionally certifying the proposed Settlement Classes pursuant to Fed. R. Civ. P. 23(a) and 23(b)(3);
- (3) appointing Plaintiffs' Counsel as Class Counsel; and
- (4) approving the proposed Notices of Class Action Settlement and Claim Form, attached as **Exhibits 1-3** to the Settlement Agreement.

* * *

Plaintiffs submit a Proposed Order, attached to the Miazad Decl. as **Exhibit B**, for the Court's convenience.

Dated: June 24, 2019
New York, New York

Respectfully submitted,

By: /s/ Ossai Miazad
Ossai Miazad

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